

JMM:WPC
F.#2010R01765

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

10-1157M

- - - - - X

UNITED STATES OF AMERICA

AFFIDAVIT IN SUPPORT OF
ARREST WARRANT

- against -

Cr. No. _____
(T. 18, U.S.C., § 1343)

JOANNE GUPPY,

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

KEVIN M. REINHARD, being duly sworn, deposes and says that he is a Special Agent with the Social Security Administration, Office of the Inspector General ("SSA-OIG"), duly appointed according to law and acting as such.

Upon information and belief, in or about and between January 2010 and September 2010, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOANNE GUPPY, together with others, did knowingly and intentionally devise a scheme and artifice to defraud the United States Social Security Administration, and to obtain money and property from the United States Social Security Administration by means of materially false pretenses, representations and promises and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, writings, signals and sounds by means of wire

communication in interstate commerce.

(Title 18, United States Code, Sections 1343, 2 and 3551 et seq.)

The source of Your deponent's information and the grounds for his belief are as follows:¹

1. I am a Special Agent with the SSA-OIG and have been so employed for approximately 13 years and am currently assigned to the Long Island Domicile Office. During my tenure as a Special Agent with the SSA-OIG, I have primarily investigated violations of federal criminal laws, including the theft of United States Government funds, and identification document fraud.

2. My investigation has revealed that the defendant JOANNE GUPPY has used the identity of another person, namely, Jane Doe, an individual whose identity is known to Your deponent.

Jane Doe

3. My investigation has revealed that Jane Doe was born in Arkansas. I have obtained a copy of Jane Doe's Arkansas birth certificate, which includes her date of birth and mother's name. Jane Doe was issued a Social Security Number two years and one month after her birth. The records of the Social Security

Administration include an individual's date of birth, place

¹ As this affidavit is submitted only to illustrate that probable cause exists to believe that the defendant committed certain crimes, all the facts known to me as a result of my investigation have not been included.

of birth and mother's name and father's name, if known. Jane Doe died in California approximately 2 years and 10 months after her birth. I have obtained a copy of Jane Doe's California death certificate which matches her date of birth, mother's name, state of birth and Social Security Number.

Replacement Birth Certificate Request

4. On July 21, 2010, an application for a replacement birth certificate for Jane Doe was submitted to the Arkansas Department of Health, Division of Vital Records. It was paid for by VitalCheck, an on-line payment company used to obtain government issued vital records. That same day, on July 21, 2010, a Certificate of Live Birth was issued in the name of Jane Doe ("Jane Doe's Replacement Birth Certificate"). Jane Doe's Replacement Birth Certificate was mailed via Federal Express to Jane Doe at 2653 Willow Glen Circle, Kissimmee, Florida (the "Kissemme Residence").

The Florida DMV Identification Card

5. On July 22, 2010, a State of Florida Identification Card number C400-437-84-831-0 was issued in the name of Jane Doe. In addition to Jane Doe's name, Jane Doe's date of birth and Social Security Number were provided to the State of Florida as part of the applicant's biographical information. The applicant's photograph and purported signature were also submitted. The applicant also supplied a copy of Jane Doe's Replacement Birth Certificate from the State of Arkansas, a

copy of the residential lease purportedly signed by Jane Doe for the property described as 2653 Willow Glen Circle, Kissimmee, Florida, and what appears to be a payroll receipt bearing Jane Doe's name, Social Security Number, and the aforementioned address. This Florida Identification Card was mailed to Jane Doe at 2653 Willow Glen Circle, Kissimmee, Florida.

The Application for Replacement Social Security Card

6. According to the records of the Social Security Administration, on August 27, 2010, a replacement Social Security Card was issued to Jane Doe and mailed to her at the Kissimmee Residence. This replacement Social Security Card was issued after the Social Security Administration processed a request for a replacement Social Security Card. In support of this application, a copy of Jane Doe's birth certificate and a copy of school identification from Logistics College was provided.

The Lease for the Kissimme Residence

7. I have seen a copy of the lease for the Kissimme Residence for Jane Doe. It is purportedly signed by Jane Doe. It also identifies Sebastian Harris as a resident. My investigation has revealed that Sebastian Harris is the son of the defendant, Joanne Guppy.

There is Probable Cause to Believe that Joanne Guppy Has Taken
The Identity of Jane Doe

8. I have reviewed Jane Doe's Florida Identification card ("Florida ID Card") from the Florida Department of Motor Vehicles issued on July 22, 2010. That identification card contain's Jane Doe's name, Social Security Number and the Kissimmee Residence, as well as a photograph purporting to be of Jane Doe. A redacted copy of the Florida ID Card photograph is attached hereto as Exhibit 1.

9. I have reviewed the defendant Joanne Guppy's New York State Driver's License ("NYS DL") photograph issued on March 27, 2003. It listed her address as 9534 238th Street, Bellerose, New York, the same purported address as for John Doe #1 discussed below. It also contained Guppy's photograph. A copy of Guppy's New York state Driver's License photograph is attached hereto as Exhibit 2.

10. I have compared the photographs of Jane Doe from the Florida ID Card and the defendant Joanne Guppy from the NYS DL. The photographs appear to depict the same individual.

Internet Social Security Claims

11. In December, 2008, the Social Security Administration implemented an Internet application process for individuals applying for certain Social Security Administration benefits, including retirement benefits. This process, called "iClaims," allows for the initiation of an application for these

benefits through an internet website rather than making a personal appearance at a Social Security Administration Office. As part of the application process, the applicant must provide his or her personal identification information including, name, Social Security Number, date of birth, gender, and address. The iClaims applicant is then asked whether the application is for the applicant or being made on behalf of another individual. Applicants making the application on their own behalf or assisting another individual in making the application may complete the application process by clicking on the option indicating that they are the applicant, or are assisting the applicant who will sign the application electronically on their own behalf. Third party applications generate a paper copy that is mailed to the applicant for a signature. Applications are then routed and reviewed by Claims Representatives of the Social Security Administration and are either approved or returned for further development.

The Internet and Definitions of Technical Terms
Pertaining to Computers

12. As part of my training and experience, I have become familiar with the Internet, which is a global network of computers and other electronic devices that communicate with each other using various means, including standard telephone lines, high-speed telecommunications links. Due to the structure of the Internet, connections between computers on the Internet routinely cross state and international borders, even when the computers communicating

with each other are in the same state. Individuals and entities use the Internet to gain access to a wide variety of information; to send information to, and receive information from, other individuals; to conduct commercial transactions; and to communicate via electronic mail ("e-mail"). An individual who wants to use Internet e-mail generally must first obtain an account with a computer that is linked to the Internet - for example, through a university, an employer, or a commercial service - which is called an "Internet Service Provider" or "ISP." Once the individual has accessed the Internet, that individual can use an e-mail account provided by their ISP or they can use the Internet to connect to web-based e-mail services to send and receive e-mail. Web-based e-mail services provide e-mail accounts that may be accessed from any computer that has access to the Internet.

13. Every computer or device on the Internet is referenced by a unique Internet Protocol ("IP") address the same way every telephone has a unique telephone number. An IP address is a series of four sets of numbers separated by a period, and each number is a whole number between 0 and 254. An example of an IP address is 192.168.10.102. Each time an individual accesses the Internet, the computer from which that individual initiates access is assigned an IP address. A central authority provides each ISP a limited block of IP addresses for use by that ISP's customers or subscribers. Most ISP's employ dynamic IP addressing, that is they

allocate any unused IP address at the time of initiation of an Internet session each time a customer or subscriber accesses the Internet. A dynamic IP address is reserved by an ISP to be shared among a group of computers over a period of time. The ISP logs the date, time and duration of the Internet session for each IP address and can identify the user of that IP address for such a session from these records. Typically, users who sporadically access the Internet via a dial-up modem will be assigned an IP address from a pool of IP addresses for the duration of each dial-up session. Once the session ends, the IP address is available for the next dial-up customer. On the other hand, some ISP's employ static IP addressing, that is a customer or subscriber's computer is assigned one IP address that is used to identify each and every Internet session initiated through that computer. In other words, a static IP address is an IP address that does not change over a period of time and is typically assigned to a specific computer.

iClaim Applications Made On Behalf of Deceased Individuals

14. My investigation has revealed that Road Runner Holding Company provided Jane Doe with Internet access at the Kissimmee Residence. I have learned that the IP address assigned to the Kissimmee Address by Road Runner is 070.121.200.230 ("The Kissimmee IP Address") and was activated on July 18, 2010.

15. On July 25, 2010, the Kissimmee IP Address was used to file an iClaim application for retirement benefits for John Doe

#1, an individual whose identity is known to Your deponent. I have reviewed the State of California Death Certificate for John Doe #1, who died in April 1984. In the iClaim application for John Doe #1, his purported address was listed as 9534 238th Street, Bellerose, New York. The iClaim application was processed at the Social Security Administration Office located in Mineola, New York.

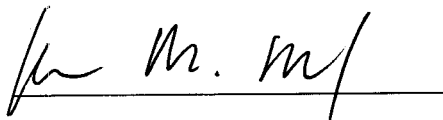
16. On July 23, 2010, the Kissimmee IP Address was used to file an iClaim for retirement benefits for John Doe #2, an individual whose identity is known to Your deponent. I have reviewed the State of California Death Certificate of John Doe #2 who died in November 1982. In the iClaim application for John Doe #2, his purported current address is listed in Elmont, New York. The iClaim application was processed at the Social Security Administration Office located in Mineola, New York. I have reviewed the State of California Death Certificate of John Doe #2 who died in November 1982.

17. On July 24, 2010, the Kissimmee IP Address was used to file an iClaim for retirement benefits for John Doe #3, an individual whose identity is known to Your deponent. I have reviewed the State of California Death Certificate of John Doe #3 who died in November 1982. In the iClaim application for John Doe #3, his purported current address is listed as the Kissimmee Address.

18. My investigation has further revealed that Optimum Online provides internet service to John Doe #4, an individual whose identity is known to Your deponent, at 807 Vivian Court, Baldwin, New York ("the Baldwin IP Address") and that the IP address is 069.113.015.165, which was activated on January 24, 2001.

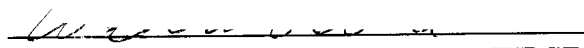
19. On July 14, 2010, the Baldwin IP Address was used to file an iClaim for John Doe #5, an individual whose identity is known to Your deponent. I have reviewed the State of California Death Certificate for John Doe #5, who died in January 1984. In the iClaim for John Doe #5, his purported current address was listed as the Kissimmee Residence.

WHEREFORE, your deponent respectfully requests that awarrant be issued for the arrest of defendant JOANNE GUPPY so that she may be dealt with according to law.



Kevin M. Reinhard
Special Agent
Social Security Administration
Office of the Inspector General

Sworn to before me this
6th day of October, 2010


UNITED STATES MAGISTRATE JUDGE

EASTERN DISTRICT OF NEW YORK

Exhibit 1

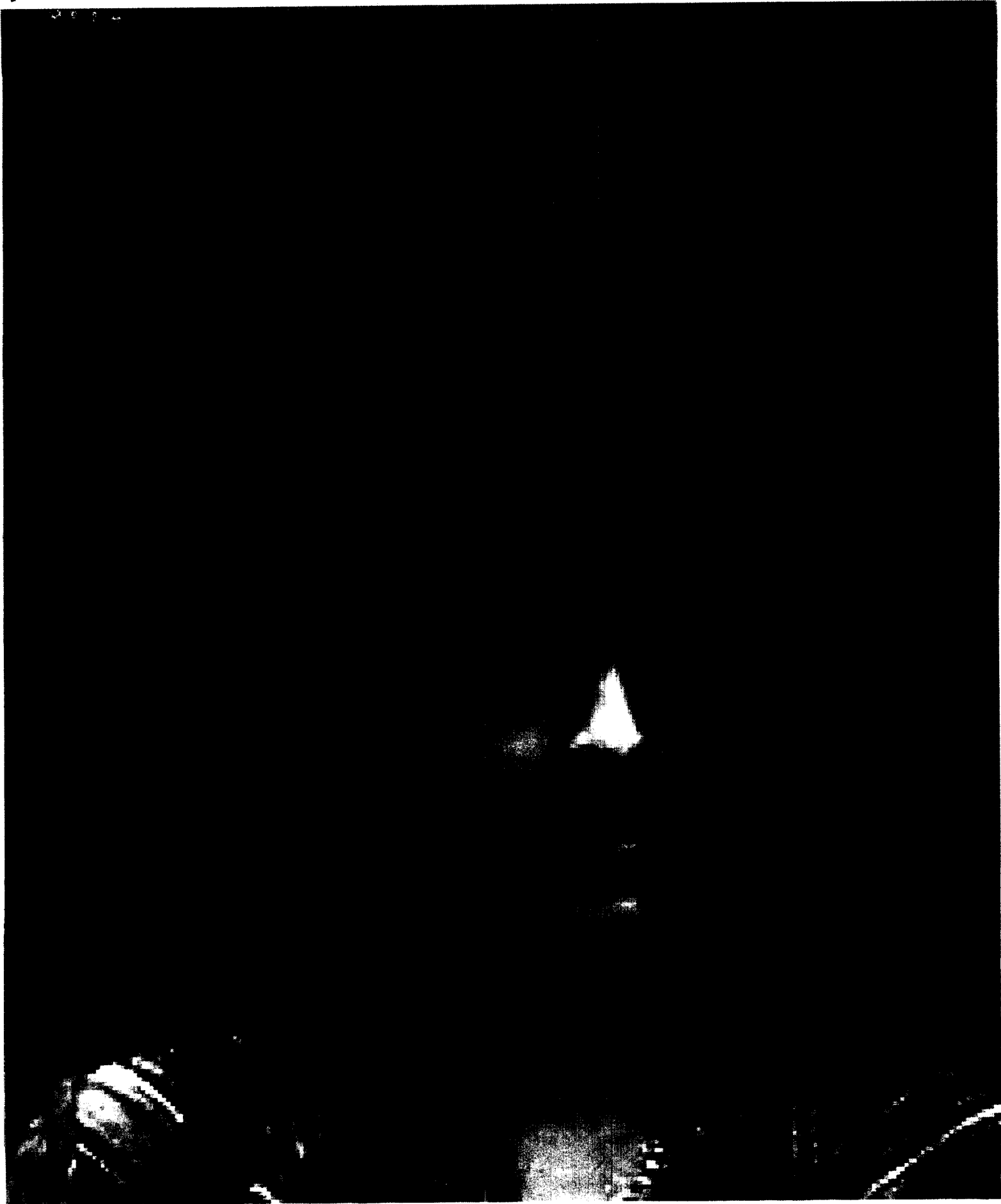


Exhibit 2

